UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

Plaintiff,

Case No. 25-CR-80015

v.

CORY LLOYD,

Defendant.

CORY LLOYD'S UNOPPOSED MOTION TO MODIFY BOND CONDITIONS

Defendant, Cory Lloyd, through undersigned counsel, hereby files this unopposed motion to modify bond conditions to permit for offshore travel in and around the Southern District of Florida (the "Motion"). In support of the Motion, Mr. Lloyd states as follows:

- 1. On February 11, 2025, a grand jury sitting in the Southern District of Florida returned an Indictment against Mr. Lloyd, charging him with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, wire fraud, in violation of 18 U.S.C. § 1343, conspiracy to defraud the United States, in violation of 18 U.S.C. § 371, and money laundering, in violation of 18 U.S.C. 1957(a). [D.E. 3].
- 2. On February 19, 2025, Mr. Lloyd appeared before the Honorable William Matthewman, Magistrate Judge for the Southern District of Florida. Judge Matthewman released Mr. Lloyd pursuant to a \$100,000 10% cash bond and \$500,000 personal surety bond. *See* [D.E. 12]. Mr. Lloyd's release bond conditions also restricted his travel within the Southern District of Florida. *See* [D.E. 16 and 17].
- 3. Since Mr. Lloyd's initial appearance, he has completely abided by all his bond conditions.

4. Mr. Lloyd respectfully requests that the Court modify his bond conditions to permit

him to travel offshore from the Southern District of Florida so that he can participate in offshore

fishing trips. Mr. Lloyd would limit his travel to 20 nautical miles, measured from any shore

located within the Southern District of Florida. Mr. Lloyd's boat is equipped with a real-time GPS

tracking system that can be monitored via the Internet. Mr. Lloyd would provide this tracking

information to his Pretrial Services Officer. Additionally, Mr. Lloyd would notify his Pretrial

Services officer in advance of any travel and provide any information required by Pretrial Services.

5. Undersigned counsel has conferred with the assigned prosecutors and they do not

oppose the proposed bond mondification. Undersigned counsel has also conferred with Mr.

Lloyd's Pretrial Services officer and she does not oppose the proposed bond modification.

6. A proposed order is attached as **Exhibit A**.

WHEREFORE, Defendant, Cory Lloyd, respectfully requests entry of an order modifying

his bond conditions as described in **Exhibit A**.

Dated: June 23, 2025

Respectfully submitted,

STUMPHAUZER KOLAYA NADLER

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CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 88.9, I hereby certify that counsel for Cory Lloyd has conferred with counsel for the United States prior to filing the Motion. The United States does not oppose the relief requested in the Motion.

/s/ Matthew DellaBetta
MATTHEW DELLABETTA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 23, 2025, I electronically filed the foregoing document with the clerk of the Court using CM/ECF

/s/ Matthew DellaBetta
MATTHEW DELLABETTA